

EXHIBIT 15

FILE COPY

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

IBN WILLIAMS

Plaintiff,

v.

COPPIN STATE UNIVERSITY, et. al.

Defendants.

Case No.: 24-C-22-004662

* * * * *

DEFENDANT'S MOTION TO VACATE ORDER FOR MEDIATION


NOW COMES Defendant Lucian Brownlee, by and through his attorneys, Tiffani S. Collins, Esq. and Collins Legal Group, LLC, and hereby files this Motion to Vacate Order for Mediation in this matter and in support thereof, states as follows:


1. On February 9, 2023, this Honorable Court issued a Scheduling Order in the above cited matter. Attached hereto as *Exhibit 1*.
2. On March 16, 2023, this Honorable Court issued an Order of Mediation in the above cited matter. Attached hereto as *Exhibit 2*.
3. The Order for Mediation provides that "If one or more of the parties believes mediation is not appropriate for this case, a written motion shall be filed within 30 days of the state of this order".
4. Defendant, Lucian Brownlee objects to the Order for Mediation because he does not believe that mediation is appropriate for this case.
5. In addition, Defendant believes the matters at issue are best resolved by this Honorable Court.
6. For the reasons enumerated above, Defendant believes the Order for Mediation in this matter should be vacated.

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CIVIL DIVISION
BALTIMORE CITY
CIRCUIT COURT FOR

WHEREFORE Defendant Lucian Brownlee respectfully requests this Honorable Court GRANT this Motion to Vacate Order for Mediation in this matter.

Respectfully submitted,
 COLLINS LEGAL GROUP, LLC



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Tiffani@tcollinslaw.com
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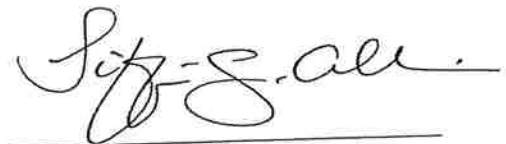
* * * * *

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of April 2023, a copy of the foregoing Motion to Waive Mediation was served via first class mail postage prepaid to all counsel of record.

Kayann Chambers, Esq.
Terence Davis, Esq.
Daniel N. Epstein, Esq.
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1901 Penn Avenue, NW
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Washington, DC 20006

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6776 Reisterstown Road
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Baltimore, MD 21202



Tiffani S. Collins, Esq.

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

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Defendants.

Case No.: 24-C-22-004662

* * * * *

PROPOSED ORDER

Upon consideration of the Motion to Vacate Order for Mediation, the record in this case and the applicable law, it is this ____ day of _____, 2023,

ORDERED that the Motion be and hereby is GRANTED; and it is further

ORDERED that the Order for Mediation by this Court on March 16, 2023, be and hereby is **VACATED**.

Judge, Circuit Court for Baltimore City

CIRCUIT COURT FOR BALTIMORE CITY
XAVIER A. CONAWAY, CLERK
111 NORTH CALVERT STREET
BALTIMORE MD, 21202
ECM NO: 462
PHONE: (410) 333-3722
TTY: (410) 333-4389

Tiffani S Collins Esq
20 South Charles Street
Suite 901
Baltimore MD 21201

PRE-TRIAL SCHEDULING ORDER

IN RE: IBN Williams vs Coppin State University, et al
CASE NO: 24-C-22-004662

Based on the Information Report(s) filed in this case and pursuant to Md. Rule 2-504(a), it is this 9 Day of February, 2023, ORDERED:

1. This case is assigned to TRACK 3A (STANDARD TRACK).
2. (a) All discovery including full resolution of all discovery disputes shall be completed no later than 8 months from the date of this order - 10/11/23.
(b) Plaintiff(s) shall identify experts 3 months after the date of this order - 05/12/23.
(c) Defendant(s) shall identify experts 6 months after the date of this order - 08/11/23.
(d) Plaintiff(s) shall identify rebuttal experts 7 months after the date of this order - 09/11/23.
(e) Expert designations shall include all information specified in Md. Rule 2-402(g) (1) (A) (B).
3. Any amended pleadings shall be filed no later than 5 months from the date of this order - 07/12/23.
4. Any additional parties must be joined no later than 5 months from the date of this order - 07/12/23.
5. Any dispositive motion(s), motion(s) to exclude expert testimony, or requests for a Daubert-Stevenson or Md. Rule 5-702 hearing shall be filed no later than 9 months from the date of this order - 11/11/23.
6. A scheduling conference pursuant to Md. Rule 2-703(c) will be held only upon written request.
7. Any party who intends to use computer-generated evidence at trial for any purpose must comply with Md. Rule 2-504.3(b).
8. (a) All parties shall appear before the court for a pre-trial and settlement conference on 01/08/24.
(b) All parties shall file no later than 5 days in advance of the conference a pre-trial memorandum covering in full each of items (1) through (12) in Sec.(b) of Md. Rule 2-504.2.
(c) The attorneys who will actually try the case, their clients, insurance representatives, and persons with full settlement authority must attend the pre-trial conference in person. Failure to attend without prior approval from the Court may result in sanctions.
9. Any motions in limine shall be filed no later than 20 days before trial.
10. Trial of this case shall begin on 02/08/24.

EXHIBIT

1

CIRCUIT COURT FOR BALTIMORE CITY
Xavier A. Conaway, Clerk of the Circuit Court
Courthouse East
111 North Calvert Street
Baltimore, MD 21202-
(410)-333-3722, TTY for Deaf: (410)-333-4389

Tiffani S Collins Esq
Collins Legal Group, LLC
20 South Charles Street
Suite 901
Baltimore, MD 21201

IN RE: 24-C-22-004662 / IBN Williams vs Coppin State University, et al

ORDER FOR MEDIATION

The parties in this case are ordered to submit to two hours of mediation that shall be completed by 11/11/23.

- A. The below listed individual has been designated by this Court to be the mediator of this dispute. Each party is required to contact the mediator within 30 days of the date of this order to establish a mediation conference date in compliance with the attached instructions. The mediation conference must be scheduled so that mediation will be completed within the time set forth on this Order.

Court Appointed Mediator:

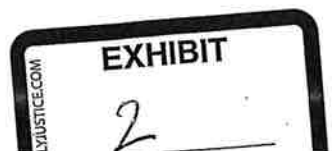
Nathan Braverman
10 E. Lee Street
#2105
Baltimore, MD 21202
Phone: (410)-733-3082

- B. If the parties choose to select a mediator for this case, a "Request to Substitute Mediator" shall be filed with the Clerk's office (with a copy faxed to the ADR Office at (410)396-7378). MD Rule 17-202(g).
- C. If one or more of the parties believes mediation is not appropriate for this case, a written motion shall be filed within 30 days of the date of this order. Failure to file a motion requesting exemption from mediation within the 30-day period may result in the denial of the motion as being untimely filed.
- D. The parties shall compensate the mediator designated by the Court based on the \$200.00 hourly rate approved by the Circuit Court for Baltimore City. All costs are to be divided equally by the plaintiff(s) and defendant(s) unless otherwise approved by Order of the Court. (Note: If there are multiple parties, each side of the dispute shall be responsible to pay a prorated share of the mediation costs. For example, if there are two plaintiffs and one defendant and total costs of the mediation of \$400, each plaintiff would pay \$100 and the defendant would pay \$200.)
- E. The parties, by agreement, may extend the mediation beyond the two hours. During any extension of the mediation, the mediator may not increase his or her hourly rate for providing services relating to this action. MD Rule 17-202(e).
- F. The parties shall abide by the attached instructions, which are incorporated as part of this Order. Failure to participate in the mediation sessions may subject the parties and/or counsel to sanctions, including contempt or removal of the case from the trial docket. In addition, as more fully described in the instructions, failure to attend scheduled sessions with a mediator will result in the parties reimbursing the mediator for the two hours of time the mediator has reserved for conducting the session.

So Ordered.

Honorable Audrey J.S. Carrion
Administrative Judge

Date: March 16, 2023



provided by law. The parties may enter into a written agreement to maintain the confidentiality of all mediation communications consistent with applicable rule. *See* MD Rule 17-105.

8. **Exemption from Court Ordered Mediation:** Any party may file a motion for exemption from court-ordered mediation. The motion must be filed within 30 days of the issuance of the Order for Mediation, or provide good cause for later filing. Parties who fail to appear at a scheduled mediation without a court order granting exemption from mediation may be subject to sanctions and/or payment of the full mediation fee. Any questions about a filed motion for exemption should be directed to the Civil ADR Office at 410-396-7374. Date-stamped copies of late filed motions should be directed to Judge Jeffrey Geller, ADR Supervisory Judge, in care of Courtney Jackson-Mills. Judge Geller will not accept or consider copies of motions that do not bear a filing date stamp of the Office the Clerk of the Court.
9. **Settlement of a Case Prior to Mediation Session:** If the case is dismissed or a settlement is reached with all parties as to all issues prior to the scheduled mediation, parties must notify the mediator, immediately, in writing.
10. **Surveys and Data-Collection Forms:** It is essential that all data and participant surveys are completed and returned to the mediator immediately following completion of each mediation. Mediators must complete a Mediator Report for each case *whether or not mediation occurs*. All counsel and parties must complete survey forms provided by the mediator. All forms must be mailed to the Civil ADR Office within seven (7) days of the last mediation session. Failure to abide this requirement will be addressed by correspondence from ADR Supervisory Judge Jeffrey Geller.

Contact information for the Circuit Court for Baltimore City Civil ADR Office:

Courtney Jackson-Mills, Director
Courthouse East, Room 248
111 N. Calvert Street
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